

## **REMARKS**

Reconsideration of the above-identified application is respectfully requested in view of the remarks that follow.

### **I. Status of Claims:**

Claims 1, 3-9 and 11-16 were pending prior to this submission. By this paper, no amendments have been made to the pending claims.

### **II. Rejection Under 35 U.S.C. §103:**

Claims 1, 3-9 and 11-16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Shimazaki U.S. Patent No. 6,785,404 (“Shimazaki”) in view of Tanaka U.S. Patent No. 6,201,882. (“Tanaka”). Applicant respectfully traverses this ground of rejection.

#### **Relationship between the expressions and the parameters**

The cited references do not disclose any structural element corresponding to the correction means recited in claim 1 and the step of “generating relational expressions” recited in claim 9. In particular, independent claims 1 and 9 require that the number of relational expressions are larger than the number of the coordinate conversion parameters to be corrected.

The Examiner, on the other hand, contends that “Shimazaki clearly indicated that additional targets may be used (col. 12, line 26-43) and it leads to more relational equations than the number of parameters.” Office Action at p. 2, paragraph 6. However, Applicant submits that the additional targets in Shimazaki do not lead to a larger number of relational expressions than the parameters for the following reasons:

- (1) Shimazaki does not disclose or suggest creating more than eight relational expressions. The cited portion, col. 12, ln. 26-43, merely indicates that the additional target points R5, R6, ... are used to facilitate determination of coordinates of the target points

R1-R4 and there is no suggestion that the additional target points R5, R6, ... are used to create their own relational expressions. Actually, the cited portion discloses that “the virtual target points R1 through R4 may be shifted so that the additional virtual target points R5, R6, ... overlap additional standard points Q5, Q6, ...” and that “[t]he amount by which the virtual target points R1 through R4 should be shifted can be calculated based on the grasped difference amount [between the additional virtual target points R5, R6, ... and the additional image standard points Q5, Q6, ...].”, which suggests that the additional target points R5, R6, ... are used merely as guides or means for refining the coordinates of the target points R1-R4; and

(2) Even if the above cited portion suggests that the additional standard points R5, R6, . . . are used to create more than eight relational expressions, Shimazaki does not disclose or suggest any idea of comparing the number of relational expressions and the number of parameters. The number of parameters in Shimazaki happens to be eight (i.e., x1 though x8 in Equation (1) at col. 9, ln. 40), but there is no suggestion that the number of relational expressions are increased so that the number relational expressions is larger than the number of parameters.

In sum, none of the cited references describe or suggest that the number of relational expressions is larger than the number of the coordinate conversion parameters to be corrected.

#### **Conversion constants to the monitor screen**

The cited references also do not disclose any structural element corresponding to the “conversion constants to the monitor screen” recited in claims 1 and 9. The conversion constants are defined in the subject application as “the X-axis magnification, the positional deviation in the

X-axis direction, the Y-axis magnification, and the positional deviation in the Y-axis direction”.

See Specification at p. 8, ln. 26-28.

The Examiner contends that the parameters x1 through x8 (col. 8, line 58) of Shimazaki correspond to the “recited conversion constants to the monitor screen” See Office Action at p. 3, paragraph 6.. However, Shimazaki’s parameters x1 through x8 are related to “real mounting parameters” of the camera (col. 9, lines 20-22) representing the mounting position of the camera, the mounting angles of the camera and deviation between the optical axis and the lens (col. 8, lines 54-58). These parameters might correspond to the “internal parameter of the camera itself” and “attachment parameters for attaching the camera to the vehicle” limitations recited in claims 1 and 9, but they cannot correspond to the recited “conversion constants to the monitor screen”, i.e. the X-axis direction, the Y-axis magnification, and the positional deviation in the Y-axis direction.

In sum, the cited documents also fail to describe or suggest the coordinate conversion parameters including the conversion constants to the monitor screen.

For the foregoing reasons, independent claims 1 and 9 patentably distinguish over the combination of Shimazaki and Tanaka. Applicant, therefore, requests that this ground of rejection be withdrawn.

### **CONCLUSION**

Based on the foregoing remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

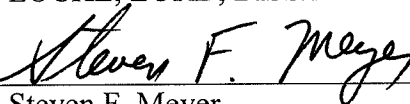
**AUTHORIZATION**

The Commissioner is hereby authorized to charge any fees which may be required for consideration of this Document to Deposit Account No. **504827**, Order No. **1004378.53230**.

A one-month Petition and Fee For Extension of Time ("Petition") is being filed along with this Response. In the event that an additional extension of time is required to that requested in the Petition, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. **504827**, Order No. **1004378.53230**.

Respectfully submitted,  
LOCKE, LORD, BISSELL & LIDDELL, L.L.P.

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By:   
Steven F. Meyer  
Registration No. 35,613

Correspondence Address:  
Address Associated With Customer Number:  
85775  
(212) 415-8600 Telephone  
(212) 303-2754 Facsimile